

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

PAUL SHAO

Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

No.: 1:23-cv-00809

**DEFENDANT ALLSTATE INSURANCE COMPANY'S
NON-CONFIDENTIAL NOTICE OF ITS MOTION TO SEAL**

PLEASE TAKE NOTICE THAT, pursuant to Local Rule 5, Defendant Allstate Insurance Company (“Defendant” or “Allstate”), by and through its counsel, hereby gives notice that it is requesting the Court to seal Exhibits 1-17 and limited portions of Defendant’s Memorandum in Support of its Motion for Summary Judgment.

Allstate is seeking to seal these documents on the grounds that they (1) contain sensitive business information; (2) are confidential information as defined by the parties Agreed Protective Order; and (3) Allstate has a compelling interest in protecting its confidential information that outweighs the public’s First Amendment right to access. Allstate’s Motion to Seal, Non-Confidential Memorandum in Support of Its Motion to Seal, and Proposed Order will be publicly filed with this Court and served upon all parties in the case.

Pursuant to Local Rule 5(C), any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of this Motion. If no objection is filed in a timely manner, the Court may treat the Motion as uncontested.

Dated: November 27, 2024

Respectfully submitted,

/s/ Laura Seferian

Laura Seferian (Va. Bar No.: 92510)

J. Scott Humphrey (admitted *pro hac vice*)

Katie M. Burnett (admitted *pro hac vice*)

Meghan Golden (admitted *pro hac vice*)

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*Attorneys for Defendant Allstate Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 27th of November, a copy of the foregoing *Defendant Allstate Insurance Company's Notice of its Motion to Seal* was emailed to:

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paulyshao@gmail.com

/s/ Laura Seferian

Laura Seferian